

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

ALTAMAHA RIVERKEEPER, ONE
HUNDRED MILES, SURFRIDER
FOUNDATION, and CENTER FOR A
SUSTAINABLE COAST, INC.,

Plaintiffs,

v.

THE UNITED STATES ARMY CORPS OF
ENGINEERS, et al.,

Defendants,

and

SEA ISLAND ACQUISITION, LLC,

Intervenor Defendant.

CIVIL ACTION NO.
4:18-cv-00251-JRH-CLR

CONSENT MOTION TO FILE JOINT PROPOSED SCHEDULING ORDER

COME NOW the Parties in the above-referenced action, and pursuant to this Court's
Order of September 13, 2019, file this Joint Proposed Scheduling Order as follows:

PROPOSED SCHEDULING ORDER

December 6, 2019	Federal Defendants to lodge the administrative record for the permit modification.
January 6, 2020	Plaintiffs and Sea Island Acquisition, LLC, shall identify and communicate to the Federal Defendants any issues regarding completeness of the record and/or any issues regarding the admission of extra record evidence. The Parties will attempt to negotiate a resolution should a dispute arise.
January 31, 2020	Deadline for parties to file motion regarding the completeness of the record and/or admission of extra record evidence. If no such motions are

	filed, any challenges regarding the record will be deemed waived. ¹
February 28, 2020	If no motions either challenging the completeness of the administrative record or seeking the admission of extra record evidence are pending, Plaintiffs' separate Motions for Summary Judgment are due.
April 3, 2020	Defendants' separate Oppositions to Summary Judgments and Cross-Motions for Summary Judgment are due.
April 24, 2020	Plaintiffs' separate Oppositions to Cross-Motions for Summary Judgment and Reply to Defendants' Oppositions Briefs are due.
May 8, 2020	Defendants' separate Replies in support of their Motions for Summary Judgment are due.

The Parties agree with the proposed schedule set forth above and respectfully request that the Court enter the Proposed Scheduling Order, which has been submitted pursuant to this Court's Order dated September 13, 2019.

Respectfully submitted, this 31st day of October, 2019.

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¹ Should the Plaintiffs or Defendant-Intervenor file any motions regarding the completeness of the record and/or for admission of extra record evidence, the response and replies will be due according to timelines for motions established by the local rules.

Plaintiffs object to this language and do not agree to waive challenges to the record if additional issues are discovered, which issues were not previously known, that raise questions as to the completeness of the record.

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